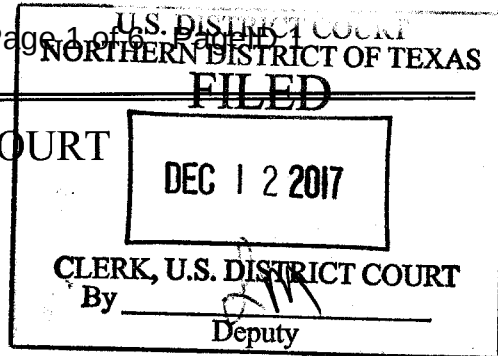


SEALED



UNITED STATES DISTRICT COURT

for the
Northern District of Texas

United States of America
v.
CHRISTOPHER MAURICE DANIELS

Case No. 3:17-MJ-917-BK

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 12, 2017 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 922(g)(9)

Prohibited person in possession of a firearm

This criminal complaint is based on these facts:

See attached affidavit Special Agent Aaron Keighley

Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: 12/12/2017

City and state: Dallas, Texas

[Signature]
Complainant's signature

Special Agent Aaron Keighley, FBI
Printed name and title

[Signature]
Judge's signature

Renee Harris Toliver, United State Magistrate Judge
Printed name and title

AFFIDAVIT

I, Special Agent Aaron W. Keighley, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. This Affiant is a Special Agent of the Federal Bureau of Investigation (FBI). I entered on duty with the FBI in October 2003 and was appointed as a Special Agent in November 2006. Since that time, I have investigated White Collar Crimes for approximately ten years and crimes related to Domestic Terrorism for approximately one and one half years. I am authorized to investigate violations of Federal laws, including violations of Title 18 U.S.C. § 922(g)(9) (Unlawful acts regarding the possession, purchase, and shipment of firearms), and have received training in conducting criminal investigations regarding these violations.

2. This affidavit is in support a criminal complaint charging Christopher Maurice Daniels with being a prohibited person in possession of a firearm, in violation of 18 U.S.C. § 922(g)(9). Specifically, there is probable cause that on or about December 12, 2017, in the Dallas Division of the Northern District of Texas, the defendant, Christopher Maurice Daniels, having been convicted of a misdemeanor crime of domestic violence, did knowingly possess in and affecting interstate commerce firearms, specifically, (1) a Taurus Protector Poly 38 special (bearing serial number JZ27175) and (2) a Norinco AK-style assault rifle (bearing partial serial number 21191).¹

¹ The serial number on the Norinco AK-style assault rifle was partially blocked by an aftermarket stock.

3. The facts set forth in this affidavit are based upon knowledge obtained during my participation in this investigation, and is intended to show merely the fact there is sufficient probable cause for the requested warrant. This affidavit does not necessarily set forth all of my knowledge about this matter, and therefore only those facts necessary to establish probable cause will be discussed.

III. BACKGROUND INFORMATION

4. The investigation of Christopher Maurice Daniels stemmed from open-source reporting, social-media posts (namely Facebook and YouTube), and other investigative techniques that identified Daniels as marching with and possessing and carrying a rifle. Daniels was interviewed by a WFAA news reporter during one such march in which Daniels was carrying a rifle. Daniels has continued to post videos to his personal, open Facebook profile in which he openly and publicly advocates violence toward law enforcement.

5. In February 2007, Daniels was convicted of Domestic Assault in the General Sessions Court, Tipton County, Tennessee. I understand that Daniels's conviction of Domestic Assault is a "misdemeanor crime of domestic violence" under 18 U.S.C. § 922(g)(9). As a result of his conviction, Daniels is prohibited from possessing a firearm under 18 U.S.C. § 922(g)(9).

6. Most recently, I became aware that on November 17, 2017, Daniels planned to travel to Detroit, Michigan, for the purpose of conducting a firearm related training event which was scheduled to take place on November 18, 2017, in Detroit, Michigan. Fliers for the training had been posted on Daniels's Facebook page and were

viewed by Affiant prior to the scheduled event.

7. I was made aware that Daniels booked travel through Spirit Airlines (Spirit) for November 17th; however, he then changed his reservation for departure on November 18, 2017. Also, I learned that Daniels placed a firearm in his checked luggage upon arrival to DFW Airport for his November 18th flight to Detroit.

8. During Daniels's travel, and presumably due to Daniels's change in flight reservations, Daniels's checked luggage was delayed en route to Detroit, Michigan. Daniels was scheduled to return to Dallas, Texas late the next day (November 19, 2017) and therefore requested that Spirit send the luggage back to Dallas once it was located.

9. Upon Daniels's return to Dallas on the evening of November 19, 2017, Spirit's records show that Daniels requested that Spirit deliver the luggage to 5850 Beltline Road, Apartment #707, Dallas, Texas 75254 (hereinafter, "the Rock Creek Apartment"). Upon exiting the airport, FBI Agents observed Daniels being driven to the Tom Thumb grocery store located at 14999 Preston Road, Dallas, Texas 75254, which is located in close proximity to the Rock Creek apartment complex. Agents then observed Daniels walking toward the Rock Creek apartment complex.

10. On November 21, 2017, FBI Agents assigned to the Dallas Fort Worth International Airport spoke with representatives from Spirit, who provided a copy of the Spirit portion of a claim check used for checking a firearm in luggage aboard Spirit aircraft. The claim check contained Daniels signature and "Bag Tag #0487720939." Spirit personnel stated Daniels would have retained another part of the claim check, which would contain the same "Bag Tag" number.

11. On November 28, 2017, FBI Agents assigned to the Dallas Division observed Daniels leaving the Rock Creek Apartment and arriving at his workplace in Carrollton, Texas. Based on the fact Daniels left the Rock Creek Apartment in the morning and commuted to his workplace, combined with the fact Daniels's luggage was delivered to the Rock Creek Apartment, it is reasonable for Affiant to believe it is Daniels's primary residence.

12. On December 5, 2017, I received correspondence from a representative of the Spirit Airlines Luggage Resolution Department, who provided additional information related to the firearm checked by Daniels. The correspondence contained a screenshot showing traveler claim check #0487720939 was related to a "Type 61" classification, which Spirit categorized as a weapon. The "Content description" was written as a "Taurus Poly Protector 38 Special +P," which I understand is a .38 caliber handgun.

13. The correspondence provided by the Spirit Airlines Luggage Resolution Department also stated Daniels's luggage was delivered to him on November 20, 2017, at 9:56 pm. The only address on file with Spirit was the Rock Creek Apartment.

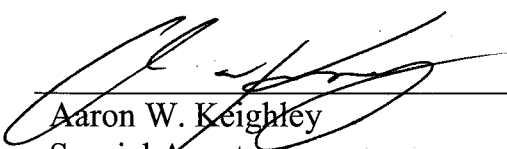
14. On December 7, 2017, I obtained a search warrant for the Rock Creek Apartment from Magistrate Judge Irma Carrillo Ramirez, which was executed on December 12, 2017. During the execution of the search at the Rock Creek Apartment, agents seized (1) a Taurus Protector Poly 38 special (bearing serial number JZ27175) and (2) a Norinco AK-style assault rifle (bearing partial serial number 21191). The Norinco AK-style assault rifle was located with Daniels in Daniels's bed. It was unloaded. A fully loaded magazine was located nearby. The Taurus Protector Poly 38 special was

loaded. The agents also found approximately 50 to 100 rounds of 7.67 caliber ammunition.

15. On December 12, 2017, I conferred with a ATF task force officer who advised me that both firearms—the Taurus Protector Poly 38 special (bearing serial number JZ27175) and the Norinco AK-style assault rifle (bearing partial serial number 21191)—were not manufactured in the state of Texas and therefore travelled in interstate and/or foreign commerce at some point prior to being located at the Rock Creek Apartment.

V. CONCLUSION

16. Based on all of the foregoing, there is probable cause to believe that on or about December 12, 2017, in the Dallas Division of the Northern District of Texas, Christopher Maurice Daniels violated 18 U.S.C. § 922(g)(9). I therefore ask that a warrant for the arrest of Christopher Maurice Daniels be issued..



Aaron W. Keighley
Special Agent
Federal Bureau of Investigation

Subscribed to and sworn before me this 12th day of December, 2017.



HONORABLE RENÉE HARRIS TOLIVER
UNITED STATES MAGISTRATE JUDGE